

Re: Wallace, et al. v. Evergreen Packaging

14 messages

Daniel Ford <daniel@sanfordlawfirm.com>

Fri, Aug 11, 2023 at 10:42 AM

To: "Ruza, Matthew" <MRuza@littler.com>

Cc: "Gaur, Shanthi" <SGaur@littler.com>, Josh Sanford <josh@sanfordlawfirm.com>, "Madison, Eva" <ECMadison@littler.com>, "Mroueh, Yara" <YMroueh@littler.com>, "Ybarra, John" <JYbarra@littler.com>, Marley Cash-Powell <marley@sanfordlawfirm.com>

Matt,

Attached are my proposed edits to the motion for extension of deadlines. I bumped the discovery and motions deadlines back one month each, just because I think the proposed window you guys wrote in was still pretty tight considering the scope of the case, and I think it still gives us plenty of time with the proposed May trial date. If you have an issue with that, happy to discuss.

I've got August 24th for R. Davis and T. Wallace depositions free on my and my clients' end. Does that date work for you all here in Little Rock?

Finally, as usually happens in cases of this size, we've had some additional consents to join come in the door since the deadline passed. Usually Defendants prefer to let us file these late in the instant case, rather than having to file an additional spin-off case. Below is the list of individuals we have who wish to join and have returned consents. If there's not a postmark date, I believe that means we received it either in person or electronically:

			Postmark
Last Name	First Name	Date on CTJ	Date
Coleman	Jimmy	5/17/2023	N/A
Clegg	Arrica	8/1/2023	8/2/2023
Edwards	Corey	7/31/2023	8/1/2023
Hubbard	Curtis	8/3/2023	8/3/2023
Huskey	Marquise	8/1/2023	8/2/2023
Lemons	Courtney	8/1/2023	8/2/2023
Jefferson	Edward L.	8/3/2023	8/5/2023
Smith	Marwan	7/21/2023	N/A

Ruza, Matthew <MRuza@littler.com>

Fri, Aug 11, 2023 at 11:48 AM

To: Daniel Ford <daniel@sanfordlawfirm.com>

Cc: "Gaur, Shanthi" <SGaur@littler.com>, Josh Sanford <josh@sanfordlawfirm.com>, "Madison, Eva" <ECMadison@littler.com>, "Mroueh, Yara" <YMroueh@littler.com>, "Ybarra, John" <JYbarra@littler.com>, Marley Cash-Powell <marley@sanfordlawfirm.com>

Thanks Dan. Preliminarily, August 24 looks good on our end for those depositions. We'll send dep notices out early next week. We'll confer with our client on the other two issues you raised and will get back to you early next week as well.

Have a good weekend,

Matt

Ybarra, John <JYbarra@littler.com>

Mon, Aug 14, 2023 at 1:37 PM

To: Daniel Ford <daniel@sanfordlawfirm.com>

Cc: "Gaur, Shanthi" <SGaur@littler.com>, Josh Sanford <josh@sanfordlawfirm.com>, "Madison, Eva" <ECMadison@littler.com>, "Mroueh, Yara" <YMroueh@littler.com>, Marley Cash-Powell <marley@sanfordlawfirm.com>, "Ruza, Matthew" <MRuza@littler.com>

Daniel,

Following up on Matt's e-mail from Friday:

- We'll agree to the 90 day extension of the schedule that you requested. We'll revise the joint motion accordingly. Please let us know if we may sign for you and submit to the Court.
- We will agree to accept the 8 tardy consents that you offered on Friday on the condition that those are the final opt-ins to be offered and accepted into the collective. If you agree to that condition, those 8 are agreed as included in the collective and can be submitted to the Court. We will agree to no further tardy ot-ins.

John Ybarra

Shareholder

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From: Daniel Ford <daniel@sanfordlawfirm.com>

Sent: Tuesday, August 15, 2023 1:57 PM

To: Ybarra, John <JYbarra@littler.com>

Cc: Gaur, Shanthi <SGaur@littler.com>; Josh Sanford <josh@sanfordlawfirm.com>; Madison, Eva <ECMadison@littler.com>; Marley Cash-Powell <marley@sanfordlawfirm.com>; Mroueh, Yara <YMroueh@littler.com>; Ruza, Matthew <MRuza@littler.com>

Subject: Re: Wallace, et al. v. Evergreen Packaging

Agreed on all counts.

Daniel Ford

Attorney at Law, Sanford Law Firm



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